

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE, TENNESSEE

WORD MUSIC, LLC., a Tennessee Limited Liability company, DAYSPRING MUSIC, LLC, a Tennessee Limited Liability Company, WORDSPRING MUSIC, LLC., a Tennessee Limited Liability company, UNICHAPPELL MUSIC, INC., a Delaware corporation, CHAPPELL & CO., INC., a Delaware corporation, COTILLION MUSIC, INC., a Delaware Corporation, RIGHTSONG MUSIC, INC., a Delaware Corporation, WALDEN MUSIC, INC., a New York Corporation, WARNER/TAMERLANE PUBLISHING CORP., a California corporation, and WB MUSIC CORP., a California corporation,

Plaintiff,

vs.-

PRIDDIS MUSIC, INC., a Nevada corporation, RICHARD L. PRIDDIS, individually, PROSOUND KARAOKE LTD., a United Kingdom corporation, MEDIOSTREAM, INC., a California corporation, d/b/a “K SUPERSTAR,” D.J. MILLER MUSIC DISTRIBUTORS, INC., a Colorado corporation, d/b/a “PROSING,” and DALE S. MILLER, Individually

Defendants.

Case No. 3:07-cv-502

**JURY DEMAND**

**Judge Haynes**

**JOINT MOTION FOR ENTRY OF  
AGREED PRELIMINARY  
INJUNCTION**

NOW COME the parties, WORD MUSIC, LLC, et al., (hereinafter collectively “Plaintiffs”), by and through their attorneys, Paul Harrison Stacey, Law Offices of Paul Harrison Stacey, P.C. and Timothy L. Warnock, Bowen, Riley, Warnock & Jacobson, PLC, and Defendants, D.J. MILLER MUSIC DISTRIBUTORS, INC., a Colorado corporation, d/b/a “PROSING”, and DALE S. MILLER, individually (“MILLER Defendants”) and for their

**JOINT MOTION FOR ENTRY OF AGREED PRELIMINARY INJUNCTION**, state as follows:

- 1.) The Plaintiffs have previously filed a motion for an order granting Plaintiffs a preliminary injunction pursuant to Rule 65 F.R.C.P., enjoining and restraining Defendants from the infringement of Plaintiffs' copyrights pending the trial and determination of the action and until further Order of this Court.
- 2.) In lieu of contesting Plaintiffs' motion, the Plaintiffs and Defendants D.J. MILLER MUSIC DISTRIBUTORS, INC., a Colorado corporation, d/b/a "PROSING," and DALE S. MILLER, Individually, ("MILLER Defendants") have agreed to the entry of a preliminary injunction.
- 3.) A Proposed Agreed Preliminary Injunction is attached hereto.

WHEREFORE, the parties respectfully request the entry of the attached AGREED ORDER FOR PRELIMINARY INJUNCTION, and providing such other and further relief as to the Court seems appropriate in the circumstances.

Respectfully submitted,

s/Paul Harrison Stacey  
Paul Harrison Stacey  
Law Offices of Paul Harrison Stacey, P.C.\*  
Attorney for Plaintiffs  
7225 N. Spring Gulch Road  
P.O. Box 4157  
Jackson, WY 83001  
Ph: 307-733-7333  
Fax: 307-733-7360  
Wy. Atty. No. 5-2615

\*Illinois Office:

202 W. Willow Avenue, Suite 103  
Wheaton, Illinois 60187

Ph: 630-462-1949

Fax: 630-462-9293

Email: [PStacey151@msn.co](mailto:PStacey151@msn.co)

s/Timothy L. Warnock

Timothy L. Warnock BPR#12844

Attorney for Plaintiffs,

Bowen, Riley, Warnock & Jacobson, PLC

1906 West End Avenue

Nashville, TN 37203

Ph.: 615-320-3700

Fax: 615-320-3737

s/ James C. Bradshaw III

James C. Bradshaw III, BPR # 13170

Michael D. Hornback, BPR # 22128

Attorney for D.J. Miller Music Distributors,  
Inc. and D.J. Miller, Individually

**WYATT, TARRANT & COMBS, LLP**

2525 West End Avenue, Suite 1500

Nashville, Tennessee 37203

615.244.0020

Facsimile: 615.256.1726

(jbradshaw@wyattfirm.com)

**CERTIFICATE OF SERVICE**

I hereby certify that service of the foregoing document was made upon the following  
Filing Users through the Electronic Filing System:

Jeff T. Goodson  
Attorney at Law  
2200 Abbott Martin Road  
Nashville, TN 37215  
Telephone: (615) 269-7676  
Facsimile: (615) 269-7675  
[jgoodson@rochfordlawyers.com](mailto:jgoodson@rochfordlawyers.com)

**Attorneys for Defendants Priddis Music, Inc., Richard L. Priddis, Individually, and Prosound Karaoke Ltd.**

this 9<sup>th</sup> day of July, 2007.

s/ Timothy L. Warnock \_\_\_\_\_